

# Metrics that Matter

Gathering the Right Information to  
Improve Your Compliance Program

## Agenda

- Creating metrics that matter
- Overcoming challenges
- Leveraging your metrics over time





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- Chief of Global Services of Spark Compliance Consulting
- Specializes in the evaluation and optimization of compliance programs
- Expert in anti-bribery and anti-corruption, data protection, and preventing modern slavery and human trafficking in the supply chain
- ISO 37001 – Anti-Bribery Management Systems and ISO 19600 Compliance Management Systems auditor and consultant and member of TC ISO 309 US TAG Group
- Former attorney at Gibson, Dunn & Crutcher




What's measured improves.

Peter F. Drucker


quotefancy





## Good metrics answer three questions

- Is my program *effective*?
- Does my program *add value*?
- Is my program *improving*?

	<u>What Most Companies Measure</u>	<u>What the DOJ Is Likely to Ask for During an Investigation</u>
	Percentage of employees that completed the training	How has the company measured the effectiveness of the training?
	Number of reports to the hotline, the type of report, and whether it was substantiated	How has the company collected, analyzed, and used information from its reporting mechanisms?



## 95% of Employees Completed Training

So  
What?

What you *really* want to know:

- Did everyone comprehend the rules?
- Did managers take it seriously?
- Did everyone learn the processes necessary to comply?
- Does the culture support an ethical environment?

## Next-Level Metrics

- 
- Easily Comprehensible
  - Obtainable
  - Connected to a Goal
  - Repeatable Over Time





## How to: Next-Level Metrics

One Size Does NOT fit all



- (1.) Define the Metric
- (2.) Apply the *So What?* test
- (3.) Define *how* the information will be gathered



## Keep Track

- Metrics being collected
- Objective or key performance indicator
- Responsible team member
- Frequency
- How you are collecting the data
- Date you began tracking the metric





## Getting Specific with Examples




Metric	So What?
Number of people that accessed each compliance-related policy on the intranet	Shows interest in/awareness of the policies and procedure
Number of times internal audit checks confirmed compliance with procedures	Evidence that the procedures are being followed
By-country or by-business unit analysis of number of times internal audit found non-compliance with procedures	




									
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## Gathering Information

- Software
- Interviews
- Questionnaires
- Surveys
- Focus groups
- Observations
- Reviewing records
- Intranet and email statistics
- Testing knowledge
- Testing key controls
- Ad hoc feedback



## Problems / Solutions



**I don't know where to start!**

**Prioritize**

**I don't have the budget!**

Use what you've got  
Use other functions

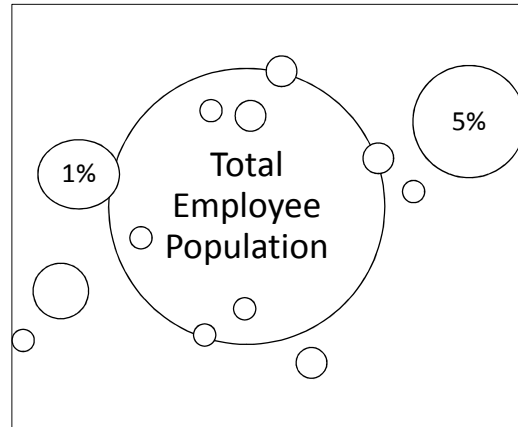
**I don't want to report - they make me look bad!**

Continuous Improvement  
Selective Sharing



## Leveraging Metrics

- Let graphics tell the story
- Tie metrics to business initiatives
- Use metrics to support requests for resources



Never measure just because you can.



Measure to learn. Measure to fix.

- Stijn Debrouwere





**Thank You! Keep In Touch!**



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